

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: The Financial Oversight and Management Board for Puerto Rico, as representative of The Commonwealth of Puerto Rico, <i>et al.</i> Debtors ¹ .	PROMESA Title III No. 17-BK 3283-LTS
--	--

MOTION TO CLARIFY

To the Honorable United States District Court Judge Laura Taylor Swain:

Grisell Cuevas-Rodríguez (hereinafter “Ms. Cuevas” or the “Plaintiff”), through the undersigned attorney, and respectfully states and prays as follows:

On December 8, 2021, the Court entered the *Order Regarding Adjourned Omnibus Objections to Claims* (Docket Entry No. 19461) which, among other things, scheduled Claim Objection Hearings on Adjourned Claim Objections.

Thereafter, on December 13th, 2021, the Court issued an Order specifically adjourning the August 20th, 2021 *Three Hundred Seventy-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Sales Tax Financing*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authority, Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and Puerto Rico Public Buildings Authority to Late-Filed Claims (hereinafter, “Three Hundred Seventy-Fourth Omnibus Objection”) (Docket No. 17923) solely as to Ms. Cuevas’s claim. (Docket No. 19502).

Subsequently, on January 10th, 2022, the Court issued the *Order Regarding Procedures for Hearings January 19-20, 2022, and February 16-17, 2022* (Docket No. 19720) for certain omnibus claim objections.

In view of the above, Plaintiff respectfully moves the Court to clarify whether her response to the Three Hundred Seventy-Fourth Omnibus Objection (Docket No. 18124) will be heard on February 2nd, 2022 or during the hearings set for January 19-20, 2022 and February 16-17, 2022.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to clarify the date on which the objection to her claim will be heard.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of January, 2022.

I HEREBY CERTIFY that on this day, a true and exact copy of this document was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

P.O. Box 195343
San Juan, Puerto Rico
00919-5343

Citibank Towers, Suite 500
252 Ponce de León Avenue
San Juan, Puerto Rico 00918

Tel. (787) 758-1400
Fax: (787) 758-1414

www.laborcounsels.com
pico@laborcounsels.com

S/ JAIME E. PICÓ-RODRÍGUEZ
Attorney for Grisell Cuevas-Rodríguez
USDCPR # 228113